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12
13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15	DEON CAGLE and SILVER)	Case No. 3:16-cv-00229-VPC
16	STATE FAIR HOUSING)	
17	COUNCIL, INC.,)	PLAINTIFFS' REQUEST FOR
18	Plaintiffs,)	ENTRY OF CONSENT DECREE
19)	AND DISMISSAL
20	vs.)	
21	BUSH Y. ABADIR and ANNE-)	
22	MARIE ABADIR, individually)	
23	and as trustees of The Bush Y.)	
24	Abadir and Anne-Marie Abadir)	
25	Revocable Trust; and DOTTIE)	
26	GOLDSBERRY,)	
27	Defendants.)	

28 Pursuant to the stipulated consent decree and joint motion for dismissal –

1 each filed concurrently with this request – plaintiffs request that the Court enter the
2 consent decree and dismiss this action.

3
4 Respectfully submitted,

5 BRANCART & BRANCART

6 */s/ Christopher Brancart*

7 _____
8 Christopher Brancart
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10 Attorney for Dion Cagle and Silver State
11 Fair Housing Council, Inc.
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CERTIFICATE OF SERVICE

Pursuant to Rule 5 of the Federal Rules of Civil Procedure, on October 19, 2016, I served by email via ECF a copy of the attached document – **PLAINTIFFS' REQUEST FOR ENTRY OF CONSENT DECREE AND DISMISSAL** – upon the following attorneys:

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/s/ Christopher Brancart

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and Silver State Fair Housing
12 Council, Inc.

13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 **DEON CAGLE and SILVER**
17 **STATE FAIR HOUSING**
18 **COUNCIL INC.,**

19 **Plaintiffs,**

20 **vs.**

21 **BUSH Y. ABADIR and ANNE-**
22 **MARIE ABADIR, individually**
23 **And as trustees of The Bush Y.**
24 **Abadir and Anne-Marie Abadir**
25 **Revocable Trust; and DOTTIE;**
26 **GOLDSBERRY,**

27 **Defendants.**

Case No. 3:16-cv-00229- VPC

CONSENT DECREE AND FINAL ORDER

28 This action was brought by Plaintiffs alleging that Defendants violated the federal Fair Housing Act, 42 U.S.C. § 3601 *et seq.*, among other laws, by allegedly discriminating based on disability in the rental of dwellings at the Colony Inn Apartments, located in Reno,

1 Nevada. Defendants have denied that they discriminated in the rental of housing or otherwise
2 violated any laws as alleged by Plaintiffs.

3 The parties have agreed that in order to avoid protracted and costly litigation the
4 controversy should be resolved without a trial or adjudication on the merits and therefore
5 have consented to entry of this decree and order. By entering into this consent decree and
6 final order ("order"), Defendants make no admission of liability or wrongdoing in connection
7 with the allegations and claims made by Plaintiffs.

8 It is hereby ordered, adjudged and decreed that:

9 1. Defendants, their employees, agents and all others acting on their behalf, shall
10 comply with the following terms during the duration of this order:

11 A. At the management office of any rental dwelling owned or operated by any
12 Defendant, Defendants shall place and maintain a HUD fair housing poster (HUD form 928)
13 in a conspicuous location where it can be seen by residents or prospective residents;

14 B. At any rental dwelling owned or operated by any Defendant, Defendants shall
15 provide each tenant or resident at the start of his/her occupancy with a copy of the HUD fair
16 housing pamphlet (HUD form 903);

17 C. In connection with any rental dwelling owned or operated by any Defendant,
18 Defendants shall require, and pay for the reasonable cost for, each employee with
19 management responsibilities to attend a fair housing training once per year for each of the
20 next three years to be provided by Silver State Fair Housing Council or any other FHIP-
21 qualified agency. Any new employee with management responsibility must attend a fair
22 housing training within 90 days of the start of his or her employment; and,

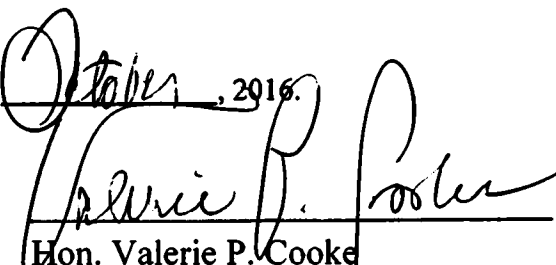
23 D. For a period of three years, starting on the anniversary date of the entry of dismissal,
24 Defendants will send a letter to SSFHC or Nevada Legal Services certifying that Defendants
25 have complied with the equitable terms of this settlement agreement during the preceding
26 year; and,

27 E. If Plaintiffs believe that Defendants have failed to comply with equitable terms of this
28 agreement, then Plaintiffs will provide written notice to Defendants, stating their concern and

1 providing Defendant with a reasonable period of time to achieve compliance before seeking
2 enforcement in the District Court.

3 2. This order shall be in effect for a period of three years from the date of entry
4 and the Court shall retain jurisdiction for purposes of enforcement. This order will terminate
5 at the end of the three year period.

6 3. The parties agree to attempt to work out in good faith any disputes that arise
7 under the terms of this order. Only after good faith mediation attempts have been exhausted
8 will the parties request the assistance of the Court in resolving the dispute.

9
10 Ordered this 31st day of October, 2016.
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12 
13 Hon. Valerie P. Cooke
14 U.S. Magistrate Judge

15 Approved as to content and form:

16 NEVADA LEGAL SERVICES, INC.

17 

18 Michelle Newman
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20 Attorneys for Plaintiff Deon Cagle

21 BRANCART & BRANCART

22 /s/ Christopher Brancart

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27 and Silver State Fair Housing Council, Inc.
28

1 HUTCHINSON & STEFFEN

2 /s/ Michael Wall

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